

1 NICOLA T. HANNA
2 United States Attorney
3 LAWRENCE S. MIDDLETON
4 Assistant United States Attorney
5 Chief, Criminal Division
6 STEVEN R. WELK
7 Assistant United States Attorney
8 Chief, Asset Forfeiture Section
9 JOHN J. KUCERA
10 Assistant United States Attorney
11 Asset Forfeiture Section
12 California Bar No. 274184
13 Federal Courthouse, 14th Floor
14 312 North Spring Street
15 Los Angeles, California 90012
16 Telephone: (213) 894-3391
17 Facsimile: (213) 894-0142
18 E-mail: John.Kucera@usdoj.gov

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20 Attorneys for Plaintiff
21 UNITED STATES OF AMERICA

22 UNITED STATES DISTRICT COURT

23 FOR THE CENTRAL DISTRICT OF CALIFORNIA

24 IN THE MATTER OF THE SEIZURE OF:

25 No. CV 18-06742-RGK (MAAx)

26 ANY AND ALL FUNDS HELD IN
27 REPUBLIC BANK OF ARIZONA
28 ACCOUNTS XXXX1889; XXXX2592,
XXXX1938, XXXX2912, AND
XXXX2500.

STIPULATION AND REQUEST TO
CONTINUE DEADLINE AND HEARING ON
MOTION TO VACATE OR MODIFY SEIZURE
WARRANTS

29 CURRENT DEADLINE AND HEARING
30 Hearing: 9/10/2018
31 Hearing Time: 9:00 A.M.

32 PROPOSED
33 Opposition Deadline: 8/27/2018
34 Hearing Deadline: 9/17/2018
35 Location: Courtroom of the
36 Hon. R. Gary
37 Klausner

38 On August 1, 2018, though his attorney of record, Thomas H.
39 Bienert, Jr., defendant James Larkin (*United States v. Michael Lacey,*
40 *et al.* CR 18-422-PHX-SPL), filed a Notice of Motion and Motion to

1 Vacate or Modify Seizure Warrants, which motion was joined by
2 defendants Lacy, Brunst, and Spear. The matter was scheduled for
3 hearing on August 29, 2018, before the Honorable Patrick J. Walsh,
4 United States Magistrate Judge for the Central District of
5 California. On August 7, 2018, the matter was reassigned to the
6 Honorable R. Gary Klausner, United States District Judge for the
7 Central District of California. Thereafter, the Court vacated all
8 dates set by the Magistrate Judge and set a hearing date for
9 September 10, 2018.

10 Government counsel will be out of town on the current hearing
11 date of September 10, 2018, and seeks to continue the hearing one
12 week, until September 17, 2018. Defendants do not oppose a brief
13 continuance of the hearing to September 17, 2018. The parties
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1 further agree that any government opposition to the motion to vacate
2 or modify seizure warrants is due no later than August 27, 2018.
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4 Dated: August 23, 2018

Respectfully submitted,

5 NICOLA T. HANNA
6 United States Attorney

7 LAWRENCE S. MIDDLETON
8 Assistant United States Attorney
Chief, Criminal Division
9 STEVEN R. WELK
Assistant United States Attorney
Chief, Asset Forfeiture Section
10

11 */s/ John Kucera*
12 JOHN J. KUCERA
13 Assistant United States Attorney

14
15 Attorneys for Plaintiff
16 UNITED STATES OF AMERICA

17 Dated: August 23, 2018

18 */s/ (per e-mail confirmation)*
19 Thomas H. Bienert
20 Kenneth M. Miller
21 Anthony R. Bisconti
22 BIENERT, MILLER & KATZMAN, PLC

23
24 Attorneys for Movant
25 JAMES LARKIN
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27
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